

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

LUCAS HINKEBEIN,)
by and through his Guardian)
and conservator, MARK HINKEBEIN,)
)
Plaintiff,)
)
v.)
)
GAVIN HOPLER, *et al.*,)
)
Defendants.)

Cause No. 4:16-CV-01655-SNLJ

JOINT MOTION TO STAY CASE MANAGEMENT ORDER AND
VACATE TRIAL SETTING

Plaintiff and Defendants, by and through the undersigned counsel, hereby submit this Joint Motion to Stay Case Management Order and Vacate Trial Setting, and state as follows:

1. Plaintiff and Defendant hereby notify the Court that they have reached a settlement in principle of the claims pending herein.
2. Plaintiff has indicated the need to negotiate with a lienholder and has stated a desire to assess the feasibility of establishing a trust for any settlement proceeds. The parties anticipate that the process of finalizing the settlement may take in excess of 60 days.
3. To allow the parties to finalize the settlement and to allow them to structure the settlement in a manner that all of the parties deem appropriate, the parties respectfully request that this Court vacate the trial setting in this matter and stay all deadlines in the Amended Case Management Order.
4. In the event that the Court grants this Joint Motion and the parties have not filed a stipulation for dismissal within 90 days of the entry of such Order, the parties will file a status update with the Court.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court enter an Order vacating the current trial date, staying all deadlines in the Amended Case Management Order, and for such other and further relief as the court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was sent via the Court's electronic notification system on this 14th day of November, 2018.

/s/ John P. Torbitzky